

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-11193-NG

SHAWN DRUMGOLD, )  
                          )  
Plaintiff            )  
                          )  
vs.                    )  
                          )  
CITY OF BOSTON, ET AL., )  
                          )  
Defendants            )  
                          )  
                          )

**DEFENDANTS' MOTION TO COMPEL TESTIMONY AND  
PRODUCTION OF DOCUMENTS DIRECTED TO RICHARD LEHR,  
AND TO COMPEL PRODUCTION OF OTHER RELEVANT  
WITNESSES FOR DEPOSITION**

Defendants hereby move to compel the attendance at deposition of witnesses Richard Lehr, Edrina Graham Payne, Olisa Graham, Michelle Payne Short, Obie Graham, Tynetta Gray, Kathy Jamison, Vantrell McPherson to give testimony and produce documents in this matter, and to allow the deposition of another witness, Terrance Taylor, who is currently in federal custody.

Further support for this motion is provided in the accompanying Memorandum of Law.

Respectfully submitted,

TIMOTHY CALLAHAN

By his attorney,

RICHARD WALSH,

By his attorney,

\_\_\_\_\_  
/s/ Mary Jo Harris  
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## THE CITY OF BOSTON

PAUL MURPHY

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\_\_\_\_/s/ William M. White \_\_\_\_\_  
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Dated: November 20, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2006 I served a copy of Defendants' Motion to Compel upon the following counsel of record by filing with the ECF/Pacer Case Management System and by sending a courtesy copy, first class mail, postage prepaid:

Rosemary Curran Scappicchio  
Four Longfellow Place, Ste. 3703  
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Michael W. Reilly  
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Two Center Plaza  
Boston, MA 02108

I further certify that an electronic version and paper copy of the attached was forwarded on November 20, 2006 to counsel for the Boston Globe:

Jonathan Albano  
Bingham McCutchin  
150 Federal Street  
Boston, MA 02110

/s/ Mary Jo Harris